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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
)

Policy and Rules Concerning the)
Interstate, Interexchange Marketplace)
)

Implementation of Section 254(g) of the)
Communications Act of 1994, as amended)
-----)

CC Docket No. 96-61

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JOINT COMMENTS OF THE
GOVERNOR OF GUAM AND
THE GUAM TELEPHONE AUTHORITY

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SUMMARY

The Governor of the Territory of Guam and the Guam Telephone Authority, in these Joint Comments, agree with the Commission's conclusion that the 1996 Act extends rate integration to U.S. territories and possessions, such as Guam. Therefore, the question is not "whether" rate integration should be implemented, the question is "how".

Nevertheless, the Governor and GTA recognize that the process may be complex and difficult. To help move that process to a fruitful and timely conclusion, the Governor proposes to convene a Working Group to assist the Commission in developing mechanisms for implementing rate integration in accordance with the timetable mandated by the 1996 Act. The Governor will invite participation from all interested parties including interexchange carriers, the Guam Public Utility Commission and this Commission. GTA looks forward to participating in the Governor's Working Group.

We suggest one approach to rate integration, based on cost averaging, but recognize that other approaches may also be valid and should be discussed within the Working Group, as well as in Reply Comments. The Governor and GTA also recommend ways in which competitive pricing can be maintained in an integrated environment.

We ask that the Commission clarify the basis for requiring the application of Section 254(g) to AT&T's Mainland - Guam services. In addition, we recognize the difficulties faced by regional carriers in averaging rates and intend to work with them to find acceptable solutions. Finally, the Governor and GTA ask that the Commission construe its power to forebear from requiring rate integration very narrowly.

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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Policy and Rules Concerning the)
Interstate, Interexchange Marketplace)

Implementation of Section 254(g) of the)
Communications Act of 1934, as amended)

CC Docket No. 96-61

JOINT COMMENTS

The Governor of the Territory of Guam ("Governor") and the Guam Telephone Authority ("GTA") hereby submit joint comments on Section VI of the above-captioned Notice of Proposed Rulemaking.¹ In this proceeding, the Federal Communications Commission ("FCC" or "Commission") asks for comment on implementation of Section 254(g) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996.²

¹ Notice of Proposed Rulemaking, FCC 96-123, March 25, 1996 ("Interexchange NPRM" or "NPRM"). Section VI of the NPRM is entitled "Rate Averaging and Integration Requirements of the 1996 Act".

² Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) ("1996 Act").

I. INTRODUCTION

A. The Territory of Guam and GTA

Guam is an island 6,000 miles from San Francisco, 3,700 miles from Honolulu and 1,550 miles from Tokyo. Guam is 30 miles long and between four and eight miles wide, covering an area of about 212 square miles. Today, Guam's population is about 140,000.

Guam lies at the crossroads of the Pacific and is the social, political and economic hub of Micronesia. It is an unincorporated Territory of the United States that was ceded to the U.S. by Spain after the Spanish American war. Initially, Guam was administered by the U.S. Navy and the indigenous population of the island was classified as "nationals" of the United States.

In 1950, Congress passed the Organic Act of Guam which established the Government of Guam and granted citizenship to the indigenous population. Amendments to the Act in the 1960's and 1970's provided for a locally elected Governor and a non-voting delegate to the U.S. Congress.

GTA is the local exchange carrier providing residential, business and exchange access service in the Territory of Guam with about 70,000 access lines and 1995 annual operating revenues of about \$40,000,000. GTA is a rural telephone company as that term is defined by the 1996 Act.³ At present, GTA is a semiautonomous agency of the Government of Guam. However, the Governor of Guam advocates the degovernmentalization of GTA and GTA has taken steps to begin that process.

B. The 1996 Act

The newly enacted Telecommunications Act of 1996 requires that, no later than August 8, 1996, the Commission:

[A]dopt rules to require that the rates charged by providers of interexchange telecommunications services to subscribers in rural and high cost areas shall be no higher

³ See 47 U.S.C. § 153(37).

than the rates charged by each such provider to its subscribers in urban areas. Such rules shall also require that a provider of interstate interexchange telecommunications services shall provide such services to its subscribers in each State at rates no higher than the rates charged to subscribers in any other State.⁴

The 1996 Act makes it clear that both geographic rate averaging and rate integration be required of providers of interexchange telecommunications carriers.⁵

C. The Interexchange NPRM

1. Rate Averaging

The Interexchange NPRM first addresses geographic rate averaging -- the process that insures that the rates charged by interexchange carriers to subscribers in rural and high cost areas are not higher than the rates charged to subscribers in urban areas. In practice, geographic rate averaging has involved the establishment of "a uniform rate schedule based upon averaged costs and rates for most interstate services."⁶

As the Interexchange NPRM notes, the Commission has never specifically required that rates be averaged.⁷ In light of the language of Section 254(g), however, the Commission must adopt such a requirement. The NPRM seeks comment on a proposed rule to require rate averaging.

2. Rate Integration

The NPRM also notes that Section 254(g) requires rate integration as well as geographic rate averaging. Rate integration refers to the process by which

⁴ 47 U.S.C. § 254(g) (emphasis added).

⁵ In addition, the 1934 Communications Act prohibits unjust or unreasonable discrimination. Using one ratemaking methodology for Mainland services and a different methodology for Guam services is a violation of Section 202 of the Act.

⁶ Integration of Rates and Services, 96 FCC 2d. 567, 570 (1984).

⁷ Interexchange NPRM, para. 67.

interexchange rates for non-contiguous U.S. points have been included within the domestic rate pattern, including geographic rate averaging. The Governor and GTA agree with the Commission's conclusion:

The Communications Act, as amended, defines the term "State" as including "the District of Columbia and the Territories and possessions". Accordingly, the 1996 Act extends rate integration to U.S. territories and possessions, such as Guam and the Northern Mariana Islands, that currently are not subject to the Commission's domestic rate integration policy.⁸

The NPRM correctly notes that since the Act requires that rate integration be implemented for Guam, the pending Petitions for Rulemaking seeking rate integration will be mooted.⁹ The Interexchange NPRM seeks comment on appropriate mechanisms to implement rate integration for Guam and other territories and possessions not currently subject to the rate integration policies. In other words, the question is no longer "whether" rate integration should be implemented, the question is "how".

II. COMMENTS

In their Comments and Reply Comments filed in connection with the Governor's Petition asking for rate integration, those opposing the Governor raised a number of arguments against including Guam in the domestic rate pattern. They said rate integration applied only to AT&T (which does not provide service on Guam), that

⁸ Interexchange NPRM, para. 77 (emphasis added).

⁹ On May 12, 1995, the Office of the Governor of Guam filed a Petition for Rulemaking to Integrate Rates (AAD 95-84). In comments filed on August 15, 1995, GTA strongly supported the Governor's Petition. Similar petitions have also been filed by JAMA Corporation, May 1, 1995 (AAD 95-85) and the Commonwealth of the Northern Mariana Islands, June 7, 1996 (AAD 95-86). The Governor and GTA request that the record in those proceedings be incorporated by reference herein.

it was inconsistent with competition, that it was anachronistic, and that it would be too costly. Congress has provided the response to those arguments:

[A] provider of interstate interexchange telecommunications services shall provide such services to its subscribers in each State at rates no higher than the rates charged to subscribers in any other State.¹⁰

The Governor and GTA take this to mean that if a provider offers services to a subscriber in New York, at whatever price, then it must offer those services at the same price in Guam, if it serves Guam. We recognize, however, that the simplicity of the approach envisioned by Congress may not prove to be so simple in implementation. Indeed, the Governor and GTA recognize that the process may be enormously complex, particularly in a telecommunications environment changed by the 1996 Act. Nevertheless, in order to comply with the deadlines in the Act, quick action is necessary. We look forward to the comments of the affected interexchange telecommunications providers and expect to reply to their suggestions on implementation.

In addition, the Governor of Guam proposes to convene a Working Group to provide input to the Commission and develop mechanisms for implementing rate integration for Guam in accordance with Section 254(g) of the 1996 Act. The Governor believes that the Working Group will help to expedite the implementation of rate integration for Guam. Furthermore, the Working Group will adhere to the timetable mandated by the 1996 Act for the adoption of rules implementing rate integration.

The Governor will invite the participation of all interested parties, including interexchange carriers, the Guam Public Utility Commission, and the Commission. GTA fully supports the Governor's proposal and intends to participate in every

¹⁰ 47 U.S.C. § 254(g).

respect. The Governor and GTA are hopeful that the Commission will support this proposal and will also directly participate, within the parameters of the ex parte rules.

This proposal is in the spirit of the idea that parties sharing common interests should communicate to help focus the issues for the Commission. It is also compatible with the history of prior rate integration proceedings where settlement agreements among the parties provided the springboard for implementation.¹¹

A. Geographic Rate Averaging

It is important to keep in mind that Section 254(g) requires not only that rates be integrated, but that they also be geographically rate averaged. For message telephone service, that process has involved the establishment of uniform mileage bands and the averaging of costs between and among those bands. Rates are then set within those mileage bands, gradually increasing with the distance of the call.

It is clear that all calls within each of the mileage bands do not have the same cost elements. For example, a call between Mariana, Arkansas and Rayville, Louisiana, a distance of 135 miles, will be priced at the same rate as a call of similar distance between Washington, D.C. and Philadelphia, Pennsylvania. These rates are the same because the costs have been averaged, not because the costs are the same.¹²

One approach to rate integration might be to add the costs of calls to and from Guam to the overall nationwide averaging process, as was done for Hawaii, Puerto Rico, Virgin Islands and Alaska. This may result in very slightly higher overall costs and, perhaps, the inclusion of additional mileage band(s). This approach appears to be entirely consistent with the provisions of the Act, requiring geographic rate

¹¹ See, e.g. Integration of Rates and Services, 61 FCC 2d 380 (1976) ("We find that the AT&T/HTC proposal for integration . . . is basically acceptable . . .").

¹² Costs between two points depend on a number of factors, including traffic density, network configurations, transmission media, switched access charges and other expenses. See Guidelines for Dominant Carriers' MTS Rates and Rate Structure Plans, 100 FCC 2d. 363 (1985).

averaging and rate integration for Guam. Nevertheless, other approaches to rate integration and rate averaging may also be valid. We expect to explore alternatives in the context of the Governor's Working Group, as well as in reply to proposals made by the affected interexchange carriers.

B. Calling Plans and Promotions

The NPRM requests comment on whether there may be competitive or other circumstances that could justify forbearance from enforcing the geographic rate averaging requirement for particular carriers or services. We do not believe that the 1996 Act was intended to reduce or eliminate all pricing flexibility, particularly in view of the increased level of competition anticipated in the Act. Therefore, we believe that calling plans, promotions and discounts which deviate from geographic rate averaging should be permitted, subject to certain caveats. First, the averaged rate must continue to be available during the promotion, plan or discount. This is consistent with current practice where the "basic rates" are offered in addition to calling plans that may offer discounts according to volume, affinity, time of day, etc. Second, if a promotion plan or discount is made available on a nationwide basis, it must also be made available in Guam. For example, if a calling plan or promotion offers a flat rate per minute for nationwide calling on a postalized basis, it must include calls that originate or terminate on Guam at a rate no higher than that offered elsewhere. Similarly, when a promotion that includes an add-on such as free INTERNET access, is offered on a nationwide basis it should also be offered on Guam.¹³ Third, no calling plan or promotion should be offered with the intent to frustrate the purpose of Section 254(g). For example, a heavy discount that applied only to calls within 1,000 miles would, for all practical purposes, exclude Guam consumers even if it were offered to Guam consumers. Such a deliberate exclusion

¹³ In their April 12, 1996 Comments in Federal-State Joint Board on Universal Service, CC Docket 96-45, both the Governor and GTA advocated the use of support mechanisms where rate integration failed to satisfy the principles of Section 254(b)(3) regarding rural, insular and high cost areas.

would render the calling plan or discount unreasonably discriminatory under Sections 202 of the Communications Act.

C. Service Provider

Section 254(g) requires that a carrier shall provide services to its subscribers in each State at rates no higher than the rates charged to its subscribers in any other State. This language would seem to apply the rate integration requirement only to those interstate interexchange providers which offer service in both States being compared. Those who do not have subscribers in currently non-integrated points would seem to be exempted from the rate integration requirement.

MCI and Sprint provide service and have subscribers in both integrated States and Guam. The existence of two competitors providing service would seem to assure that the benefits of rate integration will come to Guam. AT&T does not directly provide service or have subscribers on Guam.¹⁴ AT&T may therefore believe it is outside the requirements of Section 254(g).

However, it is possible that, if AT&T does not offer integrated rates to Guam, then its non-integrated basic mainland rates would be lower than the other major carriers. This would give AT&T an unfair advantage in intra-Mainland service and would not be consistent with the pro-competitive goals of the 1996 Act. Therefore, we recommend that the Commission clarify the basis for applying the requirements of Section 254(g) to AT&T's services between the Mainland and Guam.

A related question arises, however, when considering IT&E Overseas, Inc. -- or any other regional carrier without a significant cost base with which to average costs of providing service to Guam. As a practical matter, these carriers will be required to offer rates at competitive prices, even though these rates will not be "subsidized" through the averaging process.

¹⁴ AT&T presently provides service to Guam through interconnection with IT&E Overseas, Inc., a Guam based carrier. Calls originated by IT&E's subscribers on Guam are terminated by AT&T on the mainland. Conversely, calls originated by AT&T's subscribers on the mainland are terminated on Guam by IT&E (through GTA local exchange facilities.)

The Governor and GTA do not believe that there are easy solutions to this problem. It is not our intention or desire to drive regional carriers from the market, a result anticipated by GTE.¹³ Indeed, we would hope that the pressure placed on regional carriers to compete for Guam-Mainland traffic will have positive results, such as reduction in costs for service and the implementation of more cost-efficient facilities.¹⁴ In any case, we will study the comments made by the regional carriers and will endeavor to work with them to find acceptable solutions both in this proceeding and in the parallel Working Group process. We particularly hope that the participation of IT&E in the Working Group will facilitate the expeditious resolution of these issues.

D. Services

The 1996 Act does not limit the application of geographic rate integration policies to message telecommunications service. Rather, the 1996 Act would appear to require rate integration for all services, including data, video, and private line services. Only in limited circumstances could non-averaged rates be considered lawful.¹⁵

In the case of Guam, broad application of the averaging and integration policies is particularly appropriate. As GTA pointed out in its comments in Docket No. 96-45¹⁶, distance is an obstacle to the affordability or availability of many services on Guam, not merely MTS. For example, any service that depends on database access, either by the customer or the Local Exchange Carrier, may be prohibitively expensive because of the distance to the Service Control Point where the database is

¹³ Comments of GTE Service Corporation, File No. AAD 95-86, p. 14.

¹⁴ The Commission recently authorized the construction and operation of private non-common carrier facilities between Hawaii and Guam. Guam Telecom Ltd., 10 FCC Rcd. 12104 (1995).

¹⁵ Joint Explanatory Statement, p. 132.

¹⁶ Comments of GTA, Federal-State Joint Board on Universal Service, CC Docket No. 96-45, April 12, 1996.

stored. Yet database access is essential for services like 800/888 toll free, calling card, directory assistance, credit card verification and number portability.


Therefore, in order to assure the widest availability of service, the Commission must construe its power to forebear from requiring rate averaging and integration very narrowly.

III. CONCLUSION

The Governor and GTA have supported the inclusion of Guam within the nationwide geographic rate averaging pattern for a long time. It is gratifying to realize that the moment of fruition is so close. Nevertheless, we recognize that the actual implementation may be difficult and complex, requiring the good faith and goodwill of all parties. We are committed to the process and will make every effort to assure its success.

The Governor and GTA appreciate the opportunity to provide these Comments to the Commission. The Governor looks forward to the participation of GTA and other interested parties in the Working Group to discuss these issues on an expedited basis. The Governor will issue invitations to interested parties shortly.

Respectfully submitted,



Carl T.C. Gutierrez
Governor of Guam

Guam Telephone Authority



Veronica M. Ahern

Its Attorney

April 19, 1996

CERTIFICATE OF SERVICE

I, Gail M. Mullen, do hereby certify that a copy of the foregoing Joint Comments of the Governor of Guam and the Guam Telephone Authority, was sent by first class United States mail, postage prepaid, or by hand delivery or facsimile where indicated by an asterisk (*), this 19th day of April, 1996, to the following:

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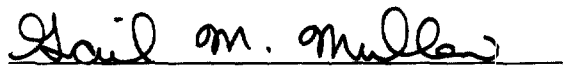
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